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Jessica Sandler <jessicas@peta.org> on 07/30/2002 12:35:20 PM

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To: NCIC OPPT/DC/USEPA/US@EPA, ChemRTK HPV/DC/USEPA/US@EPA, Rtk
Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA

cc:

Subject: Public comments

Attached please find the comments of the American animal protection community on Eastman Chemical Company's HPV test plan.

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- HPV test plan comments -- Methyl Isopropyl.pdf

July 29, 2002

Christine Todd Whitman, Administrator
U. S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N. W.
Washington, DC 20460

Re: Comments on the Eastman Chemical Company's HPV Test Plan for
Methyl Isopropyl Ketone

Dear Administrator Whitman:

The following comments on the Eastman Chemical Company's test plan for the individual chemical methyl isopropyl ketone are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

We commend the Eastman Chemical Company's test plan and robust summaries for methyl isopropyl ketone, a compound used as an intermediate in the manufacture of other chemicals and as an industrial solvent. The robust summaries include data that satisfy each of the HPV SIDS endpoints, and Eastman Chemical Company appropriately does not call for additional testing. ACGIH and NIOSH have already evaluated the health effects of this chemical and have set acceptable exposure limits of 200 ppm. Respiratory irritation, headaches, and nausea have been observed in humans at low levels of methyl isopropyl ketone. Further testing on animals would not expand the public health understanding of this chemical or change the way it is handled.

Eastman Chemical Company's proposal is therefore fully consistent with the requirement stated in the October 1999 agreement and reiterated in the December 2000 *Federal Register* notice that "participants shall conduct a thoughtful, qualitative analysis...Participants may conclude that there is sufficient data, given the totality of what is known about a chemical, that certain endpoints need not be tested." And that "before generating new information, participants should consider whether any additional information obtained would be useful or relevant."

Thank you for your attention to these comments. I can be reached at 757-622-7382, ext.1304, or via e-mail at jessicas@peta.org.



PETA

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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AN INTERNATIONAL
ORGANIZATION DEDICATED
TO PROTECTING
THE RIGHTS OF ALL ANIMALS

Sincerely,

Jessica Sandler, M.H.S.
Federal Agency Liaison